

EXHIBIT 8

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 SAN ANTONIO DIVISION

3 MELODY JOY CANTU and DR.)
RODRIGO CANTU ,)
4)
 Plaintiffs,)
5) CIVIL ACTION
VS.)
6) NO.: 5:20-CV-00746-JKP
DR. SANDRA GUERRA and) (HJB)
7 DIGITAL FORENSICS)
CORPORATION, LLC,)
8)
 Defendants.)

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11 ORAL AND VIDEOTAPED DEPOSITION OF

12 DR. RODRIGO CANTU

13 (VIA ZOOM)

14 JULY 16, 2022
15 -----

16 ORAL AND VIDEOTAPED DEPOSITION OF DR. RODRIGO CANTU,
17 produced as a witness at the instance of the DEFENDANT,
18 and duly sworn, was taken in the above-styled and
19 numbered cause on July 16, 2022 from 2:24 o'clock p.m.
20 to 5:40 o'clock p.m., Via Zoom, before
21 DEBBIE S. LONGORIA, CSR in and for the State of Texas,
22 reported by machine shorthand, pursuant to the Federal
23 Rules of Civil Procedure.
24
25

A P P E A R A N C E S

FOR THE PLAINTIFFS:

TOR EKELAND (Via Zoom)
TOR EKELAND LAW, PLLC
30 WALL STREET, 8TH FLOOR
NEW YORK, NEW YORK 10005
(718) 737-7264
tor@torekeland.com

FOR THE DEFENDANTS DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC:

BRANDY C. PEERY (Via Zoom)
RICARDO G. CEDILLO (Via Zoom)
DAVIS, CEDILLO & MENDOZA, INC.
755 E. MULBERRY, SUITE 500
SAN ANTONIO, TEXAS 78212
(210) 822-6666
bpeery@lawdcm.com
rcedillo@lawdcm.com

ALSO PRESENT:

KYLE LABYER, Videographer (Via Zoom)
MELODY JOY CANTU (Via Zoom)
NICOLE GUITELMAN (Via Zoom)
KATHLEEN N. FOLKS (Via Zoom)
DR. SANDRA GUERRA (Via Zoom)

1 A. No.

2 Q. And what are the names of the attorneys who
3 are representing you in this case?

4 A. Tor Ekeland.

03:11 5 Q. Anybody else?

6 A. And Nicole Guitelman, and there are some
7 others that I don't remember their names.

8 Q. And Ms. Guitelman is your attorney in this
9 matter?

03:11 10 A. She works with Mr. Ekeland.

11 Q. Okay. And did you sign an Engagement
12 Agreement with Mr. Ekeland and his law firm?

13 A. Yes.

14 Q. Okay. And is that a contingency fee agreement
03:11 15 or do you pay him on an hourly basis?

16 MR. EKELAND: Objection.

17 THE WITNESS: I think we talked about
18 this or my wife talked about it before. We have an
19 agreement, it's not a contingency. I think initially we
03:12 20 were paying hourly and now we have an agreement for his
21 representation through the rest of our case.

22 Q. (By Ms. Peery) Okay. And what's that
23 agreement?

24 MR. EKELAND: Objection.

03:12 25 THE WITNESS: That he will represent us

1 for the rest of the case.

2 Q. (By Ms. Peery) Okay. That he'll represent you
3 for the rest of the case, and what -- what are you
4 paying him to represent you for the rest of the case?

03:12 5 MR. EKELAND: Objection.

6 THE WITNESS: We're paying him American
7 dollars.

8 Q. (By Ms. Peery) Are you paying him on an hourly
9 basis or a flat fee?

03:12 10 MR. EKELAND: Objection. You can answer,
11 if you can.

12 THE WITNESS: We had a flat fee and there
13 are other expenses that we pay to him.

14 Q. (By Ms. Peery) How much is the flat fee?

03:12 15 MR. EKELAND: Objection.

16 THE WITNESS: I don't recall.

17 Q. (By Ms. Peery) Would that be contained in your
18 Engagement Agreement?

19 A. Yes. Or we had a -- I think there was an
03:13 20 amended Engagement Agreement that --

21 Q. Okay. So, you signed an Engagement Agreement
22 and then an amended Engagement Agreement --

23 MR. EKELAND: Objection.

24 Q. -- is that correct?

03:13 25 A. Correct.

1 Q. How much were you paying your attorney,
2 Mr. Ekeland, when you were paying him an hourly fee, how
3 much was his hourly fee?

4 MR. EKELAND: Objection. You can answer.

03:13 5 THE WITNESS: I don't recall the exact
6 amount.

7 Q. (By Ms. Peery) How much is the flat fee?

8 MR. EKELAND: Objection.

9 THE WITNESS: I don't recall the exact
03:13 10 amount, but it's in the documents if we can -- if we
11 need to pull them up.

12 Q. (By Ms. Peery) Okay. As of today,
13 approximately how much have you paid your attorneys?

14 MR. EKELAND: Objection. You can answer.

03:13 15 Q. (By Ms. Peery) For this --

16 MS. PEERY: I'm sorry, Tor.

17 MR. EKELAND: I'm sorry, did I step over
18 you or --

19 MS. PEERY: No, I stepped over you. And
03:14 20 let me just re-ask the question.

21 Q. (By Ms. Peery) How much have you paid your
22 attorney -- as of today, how much have you paid your
23 attorneys for their fees excluding expenses?

24 MR. EKELAND: Objection. You can answer.

03:14 25 THE WITNESS: I don't recall the exact

1 amount.

2 Q. (By Ms. Peery) Okay. Well, it's -- you allege
3 that you have incurred penalties and taxes because
4 you've had to dip into your retirement account to pay
03:14 5 your attorneys. How much have you had to dip into your
6 retirement account to pay your attorneys?

7 MR. EKELAND: Objection. You can answer.

8 THE WITNESS: I don't recall the exact
9 amount that we had to -- or that I've had to take from
03:14 10 retirement accounts.

11 Q. (By Ms. Peery) And when you say -- you said "I
12 have to take," has Melody taken anything out of any of
13 her retirement accounts to pay for your attorneys?

14 MR. EKELAND: Objection. You can answer.

03:15 15 THE WITNESS: I believe she has.

16 Q. (By Ms. Peery) Okay. But, as you sit here
17 today, you don't know how much you have taken out of
18 your retirement account to pay for your attorneys?

19 A. That's correct.

03:15 20 Q. And is -- but is that information that you
21 can -- you can obtain?

22 MR. EKELAND: Objection. You can answer.

23 THE WITNESS: Yes, it's information I can
24 obtain.

03:15 25 Q. (By Ms. Peery) Okay. Dr. Cantu, have you ever

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REPORTER'S CERTIFICATION

DEPOSITION OF DR. RODRIGO CANTU

JULY 16, 2022

I, Debbie S. Longoria, Certified Shorthand Reporter
in and for the State of Texas, hereby certify to the
following:

That the witness, DR. RODRIGO CANTU, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

I further certify that pursuant to FRCP Rule 30(f)
(1) that the signature of the deponent:

_____ was requested by the deponent or a party before
the completion of the deposition and returned within 30

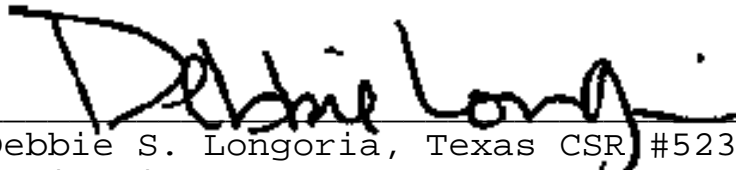
1 days from date of receipt of the transcript. If
2 returned, the attached Changes and Signature Page
3 contains any changes and the reasons therefor;

4 X was not requested by the deponent or a party
5 before the completion of the deposition.

6 I further certify that I am neither attorney nor
7 counsel for, related to, nor employed by any of the
8 parties to the action in which this testimony was taken.

9 Further, I am not a relative or employee of any
10 attorney of record in this cause, nor do I have a
11 financial interest in the action.

12 Subscribed and sworn to on this the 28th day
13 of July, 2022.

14
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16 
17 Debbie S. Longoria, Texas CSR #5232
Expiration Date: 10/31/23
18 Lexitas - Firm Registration No. 539
100 N.E. Loop 410, Suite 955
19 San Antonio, Texas 78216
20 (210) 481-7575
21
22
23
24
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